

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

BHUTAN INTERNATIONAL FESTIVAL,  
LIMITED and BHUTAN DRAGON EVENTS AND  
FESTIVALS, LIMITED,

Plaintiffs,

-against-

EDEN PROJECT, EDEN PROJECT LIMITED,  
EDEN LAB and EDENLAB LTD.,  
Defendants.

17-CV-8980 (VEC)

**NOTICE OF MOTION**

PLEASE TAKE NOTICE, that upon the attached Declaration of Tina Bingham pursuant to 28 U.S.C. § 1746, executed February 22, 2018, with the exhibits attached thereto, and upon the Complaint and all prior pleadings and proceedings had herein, Defendants Eden Project and Eden Project Limited will move this Court, before the Honorable Valerie Caproni, United States District Judge, at the United States Courthouse located at 40 Foley Square, Courtroom 443, New York, New York 10007, at a time and date convenient for the Court, for an order pursuant to Fed. R. Civ. P. 12(b)(2) and (6) dismissing the Complaint, respectively, for lack of personal jurisdiction and failure to state a claim upon which relief can be granted and for such other and further relief as the Court deems just and proper.

New York, New York  
February 23, 2018

Respectfully submitted,

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